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Honorable Christopher M Alston
CHAPTER: 7
HEARING DATE: April 10, 2025
HEARING TIME: 9:30 AM
RESPONSE DATE: April 9, 2025

5 Attorneys for Secured Creditor:
6 DEUTSCHE BANK NATIONAL TRUST
7 COMPANY, AS INDENTURE TRUSTEE,
8 ON BEHALF OF THE HOLDERS OF THE
9 TERWIN MORTGAGE TRUST 2006-8,
10 ASSET-BACKED SECURITIES, SERIES
11 2006-8

12 **UNITED STATES BANKRUPTCY COURT**
13 **WESTERN DISTRICT OF WASHINGTON**

14 In re

15 MELANIE A. SMITH,

16 Debtor.

Case No: 24-10218-CMA

Chapter 7

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS INDENTURE
TRUSTEE, ON BEHALF OF THE
HOLDERS OF THE TERWIN
MORTGAGE TRUST 2006-8, ASSET-
BACKED SECURITIES, SERIES 2006-8
RESPONSE TRUSTEE'S TO MOTION
TO SELL ESFDATED PROPERTY FREE
AND CLEAR OF LIENS, 11 USC363(F)**

SUBJECT PROPERTY:
3057 42nd Avenue West
Seattle, WA 98199

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21 Comes now DEUTSCHE BANK NATIONAL TRUST COMPANY, AS INDENTURE
22 TRUSTEE, ON BEHALF OF THE HOLDERS OF THE TERWIN MORTGAGE TRUST 2006-
23 8, ASSET-BACKED SECURITIES, SERIES 2006-8 ("Creditor"), and responds to the Chapter 7
24 Trustee's Motion to Sell Free and Clear of Liens and Encumbrances [DN 126], with respect to the
25 property located at 3057 42nd Avenue West, Seattle, WA 98199 (the "Property").

26 Absent circumstances not present here, Section 363(f)(2) of the Bankruptcy Code requires
27 consent of the secured creditors holding an interest in property of the estate as a condition
28 precedent for the trustee's authorization to sell such property free and clear of liens. Counsel for

1 the Creditor has communicated with counsel for the Trustee as to terms and conditions under which
2 the Creditor would be willing to consent to the proposed sale, and the Creditor hereby files this
3 limited response in order to protect its interest in the Property, pending further negotiations and
4 agreement.

5 WHEREFORE, Creditor requests the Trustee's motion be denied pending affirmative
6 consent of the Creditor, as evidenced by a fully executed agreed order on authorizing the sale.

7 Respectfully submitted,

8 **ALDRIDGE PITE, LLP**

9 Dated: April 9, 2025

/s/David Petteys

David Petteys, WSBA #33157

10 Attorneys for DEUTSCHE BANK NATIONAL
11 TRUST COMPANY, AS INDENTURE TRUSTEE,
12 ON BEHALF OF THE HOLDERS OF THE
13 TERWIN MORTGAGE TRUST 2006-8, ASSET-
14 BACKED SECURITIES, SERIES 2006-8
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